

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA ) NO.  
 )  
 v. )  
 )  
 WILLIAM MAGUIRE, )  
 )  
 Defendant. )

I N F O R M A T I O N

18 U.S.C. § 666 (a) (1) (B)

THE UNITED STATES ATTORNEY CHARGES:

At all times material to this Information, the Defendant WILLIAM MAGUIRE was a member and agent of the Luzerne County Housing Authority (hereinafter referred to as "LCHA"), a local government agency within the meaning of federal law that received federal assistance in excess of \$10,000 during the one-year period beginning on January 1, 2009. A person hereinafter referred to as the "UNNAMED LCHA MEMBER" was also a member of the LCHA.

The defendant WILLIAM MAGUIRE and the UNNAMED LCHA MEMBER were agents of the LCHA. As members of the LCHA, the defendant WILLIAM MAGUIRE and the UNNAMED LCHA MEMBER exercised discretionary decision-making authority on behalf of the LCHA, including participating in the awarding of contracts on behalf of the LCHA.

Between on or about January 1, 2009 and on or about June 1, 2009, in the Middle District of Pennsylvania, the Defendant,

WILLIAM MAGUIRE,

aiding and abetting the UNNAMED LCHA MEMBER, and aided and abetted by the UNNAMED LCHA MEMBER, did knowingly, intentionally and corruptly solicit and demand for the benefit of WILLIAM MAGUIRE, and did accept and agree to accept, a thing of value from another person, namely, cash in an amount less than \$5,000, intending to be rewarded in connection with support WILLIAM MAGUIRE and the UNNAMED LCHA MEMBER Provided to a business owner, hereinafter referred to as "THE UNINDICTED BUSINESS OWNER" who entered into contracts with the LCHA.

It was part of the offense that the defendant WILLIAM MAGUIRE and the UNNAMED LCHA MEMBER, acting in their capacity as members of the LCHA, supported the efforts of THE UNINDICTED BUSINESS OWNER who was seeking to enter into contracts with the LCHA involving a thing of value in excess of \$5,000.

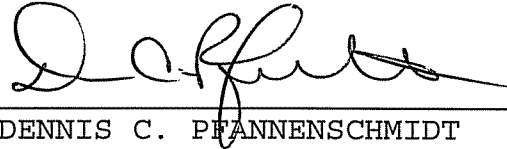
It was further a part of the offense that, after the defendant WILLIAM MAGUIRE and the UNNAMED LCHA MEMBER supported THE UNINDICTED BUSINESS OWNER for contracts with the LCHA, THE UNINDICTED BUSINESS OWNER provided the UNNAMED LCHA MEMBER with cash which the UNNAMED LCHA MEMBER then gave to WILLIAM MAGUIRE. The cash was paid to the defendant WILLIAM MAGUIRE and to the UNNAMED LCHA MEMBER for a number of reasons, including, to reward

them for past business between THE UNINDICTED BUSINESS OWNER and the LCHA.

In violation of Title 18, United States Code, §  
666(a)(1)(B).

Dated: \_\_\_\_\_

9/11/09

A handwritten signature in black ink, appearing to read "D. Pfannenschmidt", written over a horizontal line.

DENNIS C. PFANNENSCHMIDT  
UNITED STATES ATTORNEY